


UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

NICOLE TAYLOR REED,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO.
	)	
BIG LOTS STORES, INC.,	)	2:06-CV-00380-MHT-CSC
	)	
Defendant.	)	
	)	
	)	

**CERTIFICATION OF GOOD FAITH EFFORTS TO CONFER**

Pursuant to FED. R. CIV. P. 37(a)(2)(B), I hereby certify that, prior to filing the foregoing Motion to Compel and supporting memorandum, I in good faith attempted to confer with Plaintiff regarding her failure to provide responses to Big Lots' First Set of Interrogatories and First Requests for Production. Specifically, I sent Plaintiff a letter via certified mail and Federal Express overnight delivery. The foregoing documents were filed on behalf of Big Lots only after my efforts to obtain Plaintiff's delinquent discovery responses without Court action failed.

  
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Gregory L. Smith, Jr.  
Georgia Bar No. 658369